

22-08/PJG/LJK  
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Peter J. Gutowski (PG 2200)  
Lawrence J. Kahn (LK 5215)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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INDUSTRIAL CARRIERS INC.,

**07 CV 7937 (RMB)**

Plaintiff,

-against-

**GUTOWSKI AFFIRMATION**

DAYTON COMMERCIAL LIMITED a.k.a.  
GALVANIZED STEEL CONSUMERS  
ASSOCIATION a.k.a. GSCA a.k.a. GSCA  
LIMITED a.k.a. TOP UNION,

Defendants.

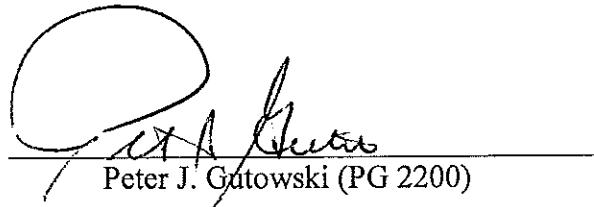
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PETER J. GUTOWSKI, an attorney at law, affirms under penalty of perjury as follows:

1. I am an attorney admitted to practice before this Court and am a partner of the law firm of Freehill Hogan & Mahar, LLP, attorneys for Interested Party Top Union (China) Limited ("Top Union China"). I am not a party to the action, am over 18 years of age, and have an address at 80 Pine Street, New York, New York. I submit this Affirmation on behalf of Top Union China in support of its application for an Order vacating the attachment of its funds.

2. I make this affirmation based upon my own personal knowledge.

3. No prior request for the relief sought herein has been made.
4. On January 22, 2008, I undertook a search of the Hong Kong Government's corporate registry via its official website located at [www.icris.cr.gov.hk](http://www.icris.cr.gov.hk). I searched that website for entities with the name "Top Union" and the result was over 50 corporate entities (both active and dissolved), which begin with those two words, including item 43, which is Top Union Maritime Co. Ltd., items 47/48, which refer to a Top Union Shipping entity, and there are also references to a Top Union Transportation company(ies). The list also includes the movant at item 5, but it illustrates the significant number of entities whose initial name contains the same words that registered in Hong Kong. A true copy of the list from the Hong Kong government's website is annexed as an Exhibit to this affirmation.

Dated: New York, New York  
January 24, 2008



Peter J. Gutowski (PG 2200)

**EX. 1**

Access to Information > List of Information published or otherwise made available

## **Access to Information**

List of Information published or otherwise made available

A	Subject	Availability
1.	Handouts (please refer to "Publications and Press Releases" - "Information Pamphlets" section)	Distributed free of charge while stock last
2.	Fact sheet : Companies Registration and Insolvency Administration	- ditto -
3.	Performance Pledge	- ditto -
4.	Companies Registry Annual Report	- ditto -

B	Subject	Availability
1.	Organization & Distribution of Business	Distributed free of charge upon request
2.	Specimen of Special Resolution passed pursuant to S.344A(1) of the Companies Ordinance	- ditto -

You need to use Adobe Acrobat Reader 5.0 or above  to view or download the documents in pdf format.

3.	Specimen of Special Resolution passed pursuant to S. 344A (5) of the Companies Ordinance	- ditto -
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You need to use Adobe Acrobat Reader 5.0 or above  to view or download the documents in pdf format.

4.	External Circulars and Memorandum Notes / Guidelines (please refer to the "Publications and Press Releases" - "Circulars / Guidelines" section)	- ditto -
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C	Subject	Availability
1.	Company Name Index	through the Companies Registry's Cyber Search Centre on the internet (website : <a href="http://www.icris.cr.gov.hk">www.icris.cr.gov.hk</a> )
2.	Document Index	or at the Registry's Public Search Centre on the 13th floor, Queensway Government Offices, 66 Queensway, Hong Kong
3.	Register of Disqualification Orders Index	
4.	Register of Charges Index	
5.	Disqualification Orders Particulars	
6.	Image records of registered charge documents	
7.	Index of Directors	
8.	Information on Registered Companies	

C(1) (left partial match or exact name match search), (2), (3) & (4) above are available free of charge. C(5) to (8) above are available on payment of the prescribed fees. For fee structure, please refer to the handout - "Price Guide to Main Services" in the "Publications and Press Releases" - "Information Pamphlets" section.

D	Subject	Availability
	Specified Forms	a) can be viewed or downloaded from the "Public Forms" - "Specified Forms" section.

- b) also available for sale in the form of CD-ROMs or individual forms at the Companies Registry. For details, please refer to the handout - "How to Purchase Specified Forms" in the "Publications and Press Releases" - "Information Pamphlets" section.



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**Company Name Search**

Your Search: LEFT PARTIAL match with 'top union'

Search Language: English

**Company Name Search Result**Displaying: Record 1 to 50 of 56 records. Jump to page  of 2 

You may click the company name to display the Company Basic Information.

Name Type: 1-Corporate name; 2-Other name; 3-Approved name for carrying on business in H.K.

No.	CR No.	Company Name	Name Type (for Non- Hong Kong company)	Name Status	Company Active Status
1	0485631	TOP UNION ADVERTISING DESIGN COMPANY LIMITED	-	Current	Dissolved
2	0690099	TOP UNION ASIA LIMITED	-	Current	Dissolved
3	0485802	TOP UNION ASIA LIMITED	-	Current	Dissolved
4	0833952	TOP UNION CAPITAL LIMITED	-	Current	Live
5	1106572	TOP UNION (CHINA) LIMITED	-	Current	Live
6	0434327	TOP UNION CONSULTANTS LIMITED	-	Current	Dissolved
7	0931621	TOP UNION CONSULTANTS LIMITED	-	Current	Live
8	0383224	TOPUNION CORPORATION LIMITED	-	Current	Dissolved
9	0812307	TOP UNION CORPORATION LIMITED	-	Current	Dissolved
10	1084953	TOP UNION CORPORATION LIMITED	-	Current	Live
11	0316031	TOPUNION DEVELOPMENT LIMITED	-	Current	Live
12	1065832	TOPUNION DIGITAL INDUSTRIAL CO., LIMITED	-	Current	Live
13	0848785	TOP UNION ELECTRIC LIMITED	-	Current	Dissolved
14	0429438	TOPUNION ENGINEERING LIMITED	-	Current	Dissolved
15	0783682	TOP UNION ENGINEERING LIMITED	-	Current	Live
16	0396927	TOP UNION ENTERPRISES LIMITED	-	Current	Dissolved
17	0965370	TOP UNION ENTERPRISES LIMITED	-	Current	Live

18	0872342	TOP UNION (FAR EAST) LIMITED	-	Current Live
19	0837528	TOP UNION HOLDINGS LIMITED	-	Current Live
20	0480837	TOP UNION HOLDINGS LIMITED	-	Current Dissolved
21	1193123	TOP UNION HONG KONG INVESTMENT LIMITED	-	Current Live
22	0335780	TOP UNION HONG KONG LIMITED	-	Current Live
23	0990247	TOP UNION INDUSTRIAL CORP. LIMITED	-	Current Live
24	0364008	TOP UNION INDUSTRIAL LIMITED	-	Current Dissolved
25	0795707	TOP UNION INDUSTRIAL LIMITED	-	Current Dissolved
26	0928342	TOPUNION INDUSTRIES LIMITED	-	Current Live
27	0821166	TOP UNION INTERNATIONAL ENTERPRISE LIMITED	-	Current Dissolved
28	0679647	TOP-UNION INTERNATIONAL HOLDINGS LIMITED	-	Current Live
29	1172882	TOP UNION INTERNATIONAL (HK) LIMITED	-	Current Live
30	0912209	TOP UNION INTERNATIONAL INVESTMENT ENTERPRISE LIMITED	-	Current Live
31	0310554	TOP UNION INTERNATIONAL LIMITED	-	Current Dissolved
32	0996529	TOP UNION INTERNATIONAL LIMITED	-	Current Live
33	1042631	TOP-UNION INT'L TRANSPORT (HK) LIMITED	-	Current Live
34	0360096	TOP UNION INVESTMENT LIMITED	-	Current Live
35	0972029	TOP UNION INVESTMENTS LIMITED	-	Current Live
36	0403301	TOP UNION LIMITED	-	Old Dissolved
37	0419748	TOP-UNION LIMITED	-	Current Dissolved
38	0564830	TOP UNION LIMITED	-	Current Live
39	0363996	TOP UNION LIMITED	-	Old Live
40	0326590	TOP UNION LIMITED	-	Old Live
41	0989529	TOP UNION LOGISTICS LIMITED	-	Current Live
42	0425092	TOP UNION MANAGEMENT LIMITED	-	Current Dissolved
43	0768236	TOP UNION MARITIME CO., LIMITED	-	Current Live
44	0856874	TOP UNION MOTORS LIMITED	-	Current Dissolved
45	0405523	TOP UNION PROPERTIES LIMITED	-	Current Dissolved
46	1046582	TOP UNION PROPERTIES LIMITED	-	Current Live
47	0876696	TOPUNION SHIPPING CO., LIMITED	-	Current Live
48	0761625	TOPUNION SHIPPING LIMITED	-	Old Live
49	0781036	TOP UNION TECHNOLOGIES LIMITED	-	Current Live
50	0857153	TOP UNION TECHNOLOGY ENTERPRISE CO., LIMITED	-	Current Dissolved

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Account available balance: HK\$0.00



### Company Name Search

Your Search: LEFT PARTIAL match with 'top union'

Search Language: English

### Company Name Search Result

Displaying: Record 51 to 56 of 56 records. Jump to page  of 2 [GO](#)

You may click the company name to display the Company Basic Information.

Name Type: 1-Corporate name; 2-Other name; 3-Approved name for carrying on business in H.K.

No.	CR No.	Company Name	Name Type (for Non- Hong Kong company)	Name Status	Company Active Status
51	0429449	TOPUNION TECHNOLOGY LIMITED	-	Current	Dissolved
52	1064661	TOP UNION TECHNOLOGY LIMITED	-	Current	Live
53	0483819	TOP UNION TRADING LIMITED	-	Current	Dissolved
54	0676685	TOP UNION TRADING LIMITED	-	Current	Live
55	0303067	TOPUNION TRANSPORTATION LIMITED	-	Old	Live
56	0714334	TOP UNION TRANSPORTATION LIMITED	-	Current	Live

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